## UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

JAMES D. GOODWYN

05 cr 10226 NMG

## GOVERNMENT'S MOTION TO SEAL AND UNSEAL

The United States Attorney hereby respectfully moves the Court to seal the indictment, the warrant for arrest, this motion and the Court's order on this motion, and any other paperwork related to this matter. As grounds for this motion, the government states that public disclosure of these materials might jeopardize the government's ability to arrest defendant.

The government also requests that upon the defendant's arrest, the case be unsealed.

Respectfully submitted,

MICHAEL J. SULLIVAN United States Attorney

By:

CYNTHIA W. LIE

Assistant U.S. Attorney

Dated: August 29, 2005